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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:20-CR-00223-IM

v.

**MOTION FOR
PROTECTIVE ORDER**

JACOB MICHAEL GAINES

Defendant.

The United States of America, through its undersigned counsel, herein moves this Court for a protective order concerning video footage being provided to defense counsel. Support for this request follows.

The government has previously provided in discovery video footage of the assault allegedly committed by defendant. Specifically, videos from the Multnomah County Detention Center and from others posted on Twitter accounts. Counsel for defendant has requested any other footage which may be available from sources within or outside the U.S. Courthouse in the government's possession. The U.S. Marshal Service has collected additional footage, and has prepared a report summarizing the footage, but has requested that its disclosure be subject to a protective order due to operational security concerns. The requested order, attached, will limit

disclosure of the footage and summary to defense counsel and those she needs to work with to perform legal responsibilities in this case, and prohibit any other use or disclosure without written permission. Counsel for defendant has reviewed the requested order and has no objection.

Dated: February 18, 2021

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

/s/ Christopher Cardani
CHRISTOPHER CARDANI
Assistant United States Attorney